

Appendix A

Assessment Summary of Institutional Controls Required by Existing CERCLA Decision Documents

Evaluation Criteria	Assessment	Possible Repairs and Improvements
100 Area Burial Ground Interim Action ROD Requirements.		
Operable -Unit Specific ROD Requirements		
The DOE will continue to use a badging program to control access to the associated sites for the duration of the interim action. Visitors entering the sites associated with the Interim Action ROD are required to be escorted at all times.		
1. Is a badging program in use?	Yes, the badging program is utilized by BHI and its subcontractors. 100 Area sites are located within the Hanford Site boundary; access is required through barricades (Wye, Yakima, and Rattlesnake). Badging is required for entry and is verified by Hanford Patrol prior to entry.	
Well drilling is prohibited, except for monitoring or remediation wells authorized in EPA and Ecology approved or Ecology approved documents. Groundwater use is prohibited, except for monitoring and treatment, as approved by EPA or Ecology.		
1. What constitutes controls to limit the use of groundwater and installation of new wells?	<p>There are site access controls on who can enter/access the Site, and people are restricted from the use of groundwater in all areas at the Hanford Site. In order to use the groundwater, a person would need a key to access the wellhead. Per WAC 173-160 requirements, all wells on the Hanford Site are capped and have a lock.</p> <p>In order to drill a well, a licensed driller has to perform the work and obtain a start card from Ecology prior to drilling. Ecology approves drilling of a well by issuing a start card. FH is responsible for all drilling activities on the Hanford Site and subcontracts drilling activities to outside vendors. FH is also responsible for documentation on drilling activities. Prior coordination and agreements are usually obtained from DOE and regulators. All drilling activities currently performed are covered under TPA milestone M-24. Drilling does not proceed unless an approved document and associated funding is provided.</p>	
No intrusive work is allowed on or near the waste sites covered in this ROD without prior approval of EPA or Ecology.		
1. Is there a process for external review?	On the Hanford Site an excavation permit, cultural resource review, and other types of documentation with regulator/tribal approval has to be in place before this type of work can begin.	
DOE shall maintain signs that warn river users of potential hazards along the shoreline from 100 Area waste sites.		
1. Are there warning signs posted along the shoreline?	Yes, warning signs are posted along the shoreline.	
2. Do the signs identify a contact? If yes, identify:	Yes, 376-7501	
DOE shall post and maintain in good condition "No Trespassing" signs along the 100 Area Shoreline.		
1. Are there "No Trespassing" signs posted along the shoreline?	Yes, "No Trespassing" signs are posted along shoreline.	

Evaluation Criteria	Assessment	Possible Repairs and Improvements
2. Are the signs in good condition?	Yes	
3. Do the signs identify a contact? If yes, identify:	No	
4. What is the location of the sign?	The signs are posted at 500-foot intervals along the shoreline.	
DOE shall maintain signs along access roads that warn Site visitors and worker of potential hazards from 100 Area waste sites.		
1. Are there warning signs along the access roads?	Yes, there are warning signs along the access roads.	
2. Do the signs identify a contact? If yes, identify:	Yes, the signs at each reactor area entrance identify the contact phone number (376-7501). There are also additional warning signs at various locations around the waste sites and within the operable units that warn of construction dangers and radioactive contamination (whether below ground or surface).	
3. What is the location of the sign?	There are general warning signs posted at the entrance to each reactor area. There are also additional warning signs posted along various access roads through the operable units.	
DOE will provide notification to EPA and Ecology upon discovery of any trespass incidents.		
1. Were there any trespass incidents?	Contacted BHI Project Mangers who verified that there were no known trespassing incidents onto any of the waste sites in Calendar Year 2002 or 2003 (to date). While there were incidents of potential trespass on the Hanford Site, none involved trespass of an IC (active or remediated) site. Trespass incidents were reported to the Benton County Sheriff's Office. When unauthorized personnel and members of the public were encountered, they were redirected to public access areas, and no incidents of trespass resulted from these attempted accesses.	
2. If yes, how many occurred?	N/A	
3. Were the trespassing events reported?	Yes	
DOE shall submit a sitewide institutional controls plan that includes the applicable institutional controls for the 100 Area operable units. This sitewide plan will be submitted to EPA and Ecology for approval as a primary document under the Tri-Party Agreement by July 2001. This plan shall be updated by DOE periodically at the request of EPA or Ecology. At a minimum, the plan shall contain the following:		
	In July of 2002, the Tri-Party agencies approved a plan entitled "Sitewide Institutional Controls Plan for Hanford CERCLA Response Actions," DOE/RL-2001-41 Rev. 0.	This is not an IC requirement per se. Subsequent to the submittal of this annual assessment, the Tri-Party Agreement agencies could decide to rectify this by updating the plan and modifying the existing CERCLA decision documents.

Evaluation Criteria	Assessment	Possible Repairs and Improvements
a) Include a comprehensive facility-wide list of all areas or locations covered by any and all decision documents at the Hanford Site that have or should have institutional controls for protection of human health or the environment. The information on the list will include, at a minimum, the location of the area, the objectives of the restriction or control, the time frame that the restrictions apply, the tools and procedures DOE will use to implement the restrictions or controls and to evaluate the effectiveness of these restrictions or controls.		
	The approved institutional controls plan "Sitewise Institutional Controls Plan for Hanford CERCLA Response Actions," DOE/RL-2001-41 Rev. 0, fulfills this requirement.	
b) Cover and legally bind where appropriate, all entities and persons, including, but not limited to, employees, contractors, lessees, agents, licensees, and visitors. In areas where DOE is aware of routine trespassing, trespassers must also be covered.		
	This plan comprehensively covers all relevant appropriate activities pertaining to the cleanup actions at the Hanford Site.	
c) Cover all activities, and reasonably anticipated future activities, including, but not limited to, any future soil disturbances, routine and non-routine utility work, well placement and drilling, recreational activities, national monument-related uses, groundwater withdrawals, paving, construction, renovation work on structures, tribal use or other activities.		
	Consistent with CERCLA RODs, all activities and reasonably anticipated future uses are consistent with this plan. Furthermore, the excavation permitting process provides additional controls and land use management.	
d) Include a tracking mechanism that identifies all land areas under restriction or control.		
	A comprehensive list of sites under restrictions and controls will be provided per TPA Appendix C updates.	For remediated 100 Area sites, expand the "Post-Closure Requirements" section of WIDS to state "Industrial land-use only," where applicable. The Tri-Party Agencies have already signed WIDS reclassification forms for the sites subject to the recommendations. These changes would have to be coordinated with EPA and Ecology.
e) Include a process to promptly notify both EPA and Ecology before making any anticipated change in land-use designation, restriction, land use, or activity for any institutional controls required by a decision document.		
	During Calendar Year 2002-2003, no changes were made to any land-use designation, restriction, land use or activity for any institutional controls required by a decision document.	

Evaluation Criteria	Assessment	Possible Repairs and Improvements
DOE will notify EPA and Ecology immediately upon discovery of any activity that is inconsistent with the operable unit-specific institutional controls objectives for the Site, or of any change in the land use or land-use designation of a site. DOE will work together with EPA and Ecology to determine a plan of action to rectify the situation, except in the case where DOE believes the activity creates an emergency situation, DOE can respond to the emergency immediately upon notification to EPA and Ecology and need not wait for EPA or Ecology input to determine a plan of action. DOE will also identify deficiencies with the institutional controls process, evaluate how to correct the process to avoid future problems, and implement these changes after consulting with EPA and Ecology.		
1. Does RL have a process in place to identify deficiencies and notify EPA and Ecology?	DOE is developing a procedure to ensure any future notifications are provided immediately upon discovery of any activity that is inconsistent with the OU-specific ICs objectives. The first annual assessment of the ICs did not result in discovery of any activity that was inconsistent with the operable unit-specific institutional controls objectives for the Site, or of any change in the land use or land-use designation of a site. Consistent with DOE's internal assessment procedures, any identified improvements and/or deficiencies will be evaluated for corrective actions in consultation with EPA and Ecology.	Procedures will be developed for implementation as soon as practicable.
DOE will identify a point of contact for implementing, maintaining, and monitoring institutional controls for the 100 Area, as well as the Hanford Site.		
1. Has a point of contact been identified?	DOE/RL-Closure Division is the designated organization for implementation, maintaining, and monitoring institutional controls for the Hanford Site. The point of contact is Alex Teimouri, 509-376-6222.	
DOE will comply with Tri-Party Agreement requirements to request and obtain funding to institute and maintain institutional controls as a compliance requirement under the Tri-Party Agreement.		
1. Is there funding to institute and maintain ICs?	As of this assessment period, there is no separate funding for the purposes of instituting and maintaining institutional controls. All institutional controls instituted and implemented at the Hanford Site are currently integrated into the existing project execution scope. RL Lifecycle Funding Profile for FY03-35 indicates approximately 34 million dollars for near-term stewardship, which includes Post-Closure and Long -Term Surveillance and Maintenance, Stewardship Contingency, and Sitewide Project Management and Support.	This is not an IC requirement per se. Subsequent to the submittal of this annual assessment, the Tri-Party Agreement agencies could decide to rectify this by updating the plan and modifying the existing CERCLA decision document. This "IC" is not consistent with TPA and requires changes to the IC Plan and the ROD.
DOE will notify EPA and Ecology at least 6 months before any transfer, sale, or lease of any property subject to institutional controls required by a CERCLA decision document so that EPA and Ecology can be involved in discussions to ensure that appropriate provisions are included in the conveyance documents to maintain effective institutional controls. If it is not possible for DOE to notify EPA and Ecology at least 6 months before any transfer, sale, or lease, then DOE will notify EPA and Ecology as soon as possible, but no later than 60 days before the transfer, sale, or lease of any property subject to institutional controls.		

Evaluation Criteria	Assessment	Possible Repairs and Improvements
1. Has there been a land transfer that requires EPA and Ecology approval? 2. Is there an internal RL procedure in place to ensure appropriate notification?	As of this assessment period, there has been no transfer, sale, or lease of property that would warrant a notification to EPA and Ecology. The existing RL procedures would require such transaction be reported to EPA and Ecology as per the requirement. The existing DOE and contractor procedures (BHL-EE-02, Environmental Requirements, Section 13) require deed restrictions to be registered with the county only if there is a land or property transfer.	
DOE will not delete or terminate any institutional controls unless EPA and Ecology have concurred in the deletion or termination.		
1. Has DOE deleted or terminated any ICs?	During this assessment period, no institutional controls have been deleted or terminated.	
DOE will evaluate the implementation and effectiveness of institutional controls for the Hanford Site and the 100 Area operable units on an annual basis. The annual institutional controls monitoring report shall be written by DOE and submitted to EPA and Ecology as a primary document under the Tri-Party Agreement. The report shall be consistent with the requirements established in the sitewide institutional controls plan. Justification will be provided for any information that is not included as required by the sitewide plan. The annual monitoring report will be due on September 30 of each year and will summarize the results of the evaluation for the preceding calendar year. In addition, after the comprehensive sitewide approach is well established and DOE has demonstrated its effectiveness, the frequency of future monitoring reports may be modified subject to approval by EPA and Ecology. The institutional controls monitoring report, at a minimum, must contain:		
a) A description of how DOE is meeting the sitewide institutional controls requirements b) A description of how DOE is meeting the operable unit-specific objectives, including results of visual field inspections of all areas subject to operable unit-specific restrictions c) An evaluation of whether or not all operable unit-specific and sitewide institutional controls requirements are being met d) A description of any deficiencies and what efforts or measures have been or will be taken to correct problems.		
1. Has DOE assessed the implementation and effectiveness of the ICs on an annual basis? 2. Has DOE met the intent of Section 4.2 of the IC Plan? 3. Are the IC monitoring report submittal dates consistent? 4. How often should future IC monitoring reports be prepared?	The first annual assessment adheres to the specific requirements and intent of the IC Plan as specified. The first annual assessment report is due in July 2003, however, in the future an agreed upon date for the submittal of the IC report would have to be negotiated with the Tri-Party agencies. DOE has established a comprehensive sitewide approach vis -à-vis its own internal procedures and requirements as implemented by the site contractors.	
EPA and Ecology review of the institutional controls monitoring report will follow existing procedures for agency review of primary documents.		
1. Does the submittal of this assessment report meet the requirements of the IC Plan?	The annual assessment report is submitted consistent with Section 4.2 of the IC Plan.	A further dialogue with the Tri-Party Agencies is necessary regarding the designation of documents such as the IC Plan or the annual assessment report as "primary TPA document" consistent with the TPA definition.
Explanation of Significant Difference for the 100 Area Remaining Sites ROD Requirements.		

Evaluation Criteria	Assessment	Possible Repairs and Improvements
No specific institutional control requirements were given.	Not applicable	
100-NR-1 Operable Unit ROD Requirements.		
Operable-Unit Specific ROD Requirements		
The DOE will continue to use a badging program to control access to the associated sites for the duration of the interim action. Visitors entering the sites associated with the Interim Action ROD are required to be escorted at all times.		
1. Is a badging program in use?	Yes, the badging program is utilized by BHI and its subcontractors. 100 Area sites are located within the Hanford boundary, badging is required for entry, and is verified by Hanford Patrol.	
DOE will utilize the onsite excavation permit process to control land use (e.g., well drilling and excavation of soil) within the 100 Area operable units to prohibit any drilling or excavation except as approved by Ecology.		
1. Is the excavation permit process implemented?	Yes, the excavation permit process is used to avoid unplanned disturbance or infiltration, to inform and protect personnel regarding potential exposure to hazardous substances, and to avoid the creation of potential pathways for the migration of hazardous substances. FH is responsible for issuing excavation permits on the Hanford Site. The excavation permit is reviewed and approved by the Hanford Site utility representatives. The review process also includes a check for WIDS waste sites in the vicinity of excavation.	
DOE will maintain existing signs prohibiting public access.		
1. Are there warning signs posted along the shoreline?	Yes, warning signs are posted along the shoreline.	
2. Do the signs identify a contact? If yes, identify:	Yes, the contact number listed is 509-376-7501.	
3. Are there "No Trespassing" signs posted along the shoreline?	Yes, "No Trespassing" signs are posted along the shoreline.	
4. Are the signs in good condition?	Yes, the signs are generally in good condition; some are faded, but legible.	
5. Do the signs identify a contact? If yes, identify:	No	
6. What is the location of the signs?	The signs are posted in various locations. The "No Trespassing" signs are posted above the river shoreline, along the shoreline in places, on access roads, and next to various waste sites.	
7. Are there warning signs along the access roads?	Yes, there are warning signs along the access roads.	
8. Do the signs identify a contact? If yes, identify:	Yes, the signs at the entrance into each reactor area identify the contact phone number (376-7501). There are also additional warning signs at various locations around the waste sites and within the operable units that do not have contact numbers, but they do warn of construction dangers or radiation entry requirements.	

Evaluation Criteria	Assessment	Possible Repairs and Improvements
9. What is the location of the sign?	There are general warning signs posted at the entrance to each reactor area. There are also additional warning signs posted at various access roads.	
DOE will provide notification to EPA and Ecology upon discovery of any trespass incidents.		
1. Were there any trespass incidents?	Contacted BHI Project Managers verified there were no known trespassing incidents onto any of the waste sites in Calendar Year 2002 or 2003 (to date). While there were incidents of potential trespass on the Hanford Site, none involved trespass of an IC (active or remediated) site. Trespass incidents were reported to the Benton County Sheriff's Office. When unauthorized personnel and members of the public were encountered, they were redirected to public access areas, and no incidents of trespass resulted from these attempted accesses.	
2. If yes, how many occurred?	N/A	
3. Were the trespassing events reported?	Yes	
Trespass incident will be reported to Benton County Sheriff's Office for investigation and evaluation for possible prosecution.		
1. Were any trespassing incidents reported to the Benton County Sheriff?	Yes	
DOE will add access restriction language to any land transfer, sale, or lease of property that the U.S. Government considers appropriate while institutional controls are compulsory, and Ecology will have to approve any access restrictions before transfer, sale, or lease.		
1. Has there been a land transfer that requires EPA and Ecology approval? 2. Is there an internal RL procedure in place to ensure appropriate notification? 3. Is there a system in place that the Realty Officer can use to verify deed restrictions?	RL Realty Officer has the responsibility for land transfer, sale, or lease of property. During Calendar Year 2002-2003, no such transactions took place [On January 23, 2002, RL, by mutual agreement, entered into a lease with the Composite Power Corporation (CPC). The lease amendment contained a contingency providing a 60-day notice and opportunity to EPA and Ecology to review the subject lease.] As a matter of internal procedure, the Realty Officer would incorporate such restrictions in any real estate transactions. A process to identify IC restrictions placed on a site during the property transfer exists. The WIDS currently has a data field for institutional controls, e.g., deed restrictions. GSA Form SF-118 is used to document the IC restrictions. The existing DOE and contractor procedures (BHI-EE-02, Environmental Requirements, Section 13) require deed restrictions to be registered with the county only if there is a land or property transfer.	

Evaluation Criteria	Assessment	Possible Repairs and Improvements
Until final remedy selection, DOE shall not delete or terminate any institutional control requirement established in this Interim Action ROD unless Ecology have provided written concurrence on the deletion or termination and appropriate documentation has been placed in the Administrative Record.		
1. Did DOE delete or terminate any institutional control requirement established in this Interim Action ROD?	No	
2. If so, did Ecology provide written concurrence on the deletion or termination and has appropriate documentation been placed in the Administrative Record?	N/A	
DOE will evaluate the implementation and effectiveness of institutional controls for the 100-NR-1 on an annual basis. The DOE will submit report to Ecology by July 31 of each year summarizing the results of the evaluation for the preceding calendar year. At a minimum, the report shall contain an evaluation of whether or not the institutional controls requirements continue to be met and a description of any deficiencies discovered and measures taken to correct problems.		
1. Do the existing institutional controls, evaluated in preceding year, continue to be effective?	Prior to July 31, 2002, DOE submitted institutional controls summary report for the 100-NR-1 and 100-NR-2 operable units, and the 100 Area remaining sites, which evaluated the implementation and effectiveness of the ICs established in the RODs. Subsequently, this annual report is incorporating an assessment of the aforementioned OUs and the remaining sites.	Additional measures may be necessary in the future to ensure long-term viability of ICs, if the final remedial actions selected for the 100 Areas do not allow f or unrestricted land use. Any additional controls may need to be specified as part of the final remedy.
	All ICs were followed as required under the respective interim action RODs. Established ICs provided adequate safeguards for remediation actions. ICs and long-term monitoring will continue to be required for sites where wastes are left in place and preclude an unrestricted land use.	
Amended 100-HR-3 Operable Unit ROD Requirements.		
Institutional controls for protection of human health required by the 1996 ROD are unchanged.		
	Not applicable	
100-NR-1 and 100-NR-2 Interim Remedial Action ROD Requirements.		
Operable-Unit Specific ROD Requirements		
The DOE will continue to use a badging program to control access to the associated sites for the duration of the interim action. Visitors entering the sites associated with the Interim Action ROD are required to be escorted at all times.		
1. Is a badging program in use?	Yes, the badging program is utilized by BHI and its subcontractors. 100 Area sites are located within the Hanford boundary, badging is required for entry and is verified by Hanford Patrol.	
2. Is there a sitewide badging program in use?	FH manages the sitewide badging program through an implementing procedure. There are strict requirements for the visitors entering the Hanford Site. Visitors are required to be escorted at all times.	

Evaluation Criteria	Assessment	Possible Repairs and Improvements
DOE will utilize the onsite excavation permit process to control well drilling and excavation of soil within the 100 Area operable units to prohibit any drilling or excavation except as approved by Ecology.		
1. Is the excavation permit process implemented?	DOE controls all intrusive work in waste site areas. Excavation permits remedial actions are obtained through ERC Procedure BHI-MA-02, Procedure 6.12, "Excavation Permit Procedure. "Well drilling in any waste site area is prohibited, except for monitoring or remediation wells authorized in regulator-approved documents. Groundwater use is prohibited, except for limited research purposes, monitoring, and treatment authorized in regulator-approved documents.	
DOE will maintain existing signs prohibiting public access.		
1. Are there warning signs posted along the shoreline?	Yes, warning signs are posted along the shoreline.	
2. Do the signs identify a contact? If yes, identify:	Yes, the contact number listed is 509-376-7501.	
3. Are there "No Trespassing" signs posted along the shoreline?	Yes, "No Trespassing" signs are posted along the shoreline.	
4. Are the signs in good condition?	Yes, the signs are generally in good condition; some are faded, but legible.	
5. Do the signs identify a contact? If yes, identify:	No, the institutional control requirement identified in the 100-NR-1 and 100-NR-2 OU ROD includes a requirement to maintain existing signs. Signs were posted along the access road, however, one of the two phone numbers listed for access to the waste site (100-N-14) was inaccurate.	ERC contacted FH and determined that one of the phone numbers listed on the sign was inaccurate (FH has a borrow pit on the access road). ERC removed the incorrect phone number from the sign.
6. What is the location of the sign?	The signs are posted in various locations. The "No Trespassing" signs are posted above the river shoreline, along the shoreline in places, on access roads, and next to various waste sites.	
7. Are there warning signs along the access roads?	Yes, there are warning signs along the access roads.	
8. Do the signs identify a contact? If yes, identify:	Yes, the signs at the entrance into each reactor area identify the contact phone number (376-7501). There are also additional warning signs at various locations around the waste sites and within the operable units that do not have contact numbers, but warn of construction dangers or radiation entry requirements.	
9. What is the location of the sign?	There are general warning signs posted at the entrance to each reactor area. There are also additional warning signs posted at various access roads.	

Evaluation Criteria	Assessment	Possible Repairs and Improvements
10. Are there warning signs posted?	There are "No Trespassing" signs every 500 feet along the perimeter of the Hanford Site. This requirement is specified in a contractor requirements document. The individual waste sites are posted.	
DOE will provide notification to EPA and Ecology upon discovery of any trespass incidents.		
1. Were there any trespass incidents?	Contacted BHI Project Managers verified there were no known trespassing incidents onto any of the waste sites in Calendar Year 2002 or 2003 (to date). While there were incidents of potential trespass on the Hanford Site, none involved trespass of an IC (active or remediated) site. Trespass incidents were reported to the Benton County Sheriff's Office. When unauthorized personnel and members of the public were encountered, they were redirected to public access areas, and no incidents of trespass resulted from these attempted accesses.	
2. If yes, how many occurred?	N/A	
3. Were the trespassing events reported?	Yes	
4. Were there any trespass incidents reported?	No notification was made to Ecology, as no trespassing incidents occurred on the Hanford Site in Calendar Year 2002.	
Trespass incident will be reported to Benton County Sheriff's Office for investigation and evaluation for possible prosecution.		
1. Were any trespassing incidents reported to the Benton County Sheriff?	While there were incidents of potential trespass on the Hanford Site, none involved trespass of an IC (active or remediated) site. Trespass incidents were reported to the Benton County Sheriff's Office. When unauthorized personnel and members of the public were encountered, they were redirected to public access areas, and no incidents of trespass resulted from these attempted accesses.	
DOE will take the necessary precautions to add access restriction language to any land transfer, sale, or lease of property that the U.S. Government considers appropriate while institutional controls are compulsory, and Ecology will have to approve any access restrictions before transfer, sale, or lease.		

Evaluation Criteria	Assessment	Possible Repairs and Improvements
1. Has there been a land transfer that requires EPA and Ecology approval? 2. Is there an internal RL procedure in place to ensure appropriate notification? 3. Is there a system in place that the Realty Officer can use to verify deed restrictions?	RL Realty Officer has the responsibility for land transfer, sale, or lease of property. During Calendar Year 2002-2003, no such transactions took place. [On January 23, 2002, RL, by mutual agreement, entered into a lease with the Composite Power Corporation (CPC). The lease amendment contained a contingency providing a 60-day notice and opportunity to EPA and Ecology to review the subject lease.] As a matter of internal procedure, the Realty Officer would incorporate such restrictions in any real estate transactions. A process to identify IC restrictions placed on a site during the property transfer exists. The WIDS currently has a data field for institutional controls, e.g., deed restrictions. GSA Form SF-118 is used to document the IC restrictions. The existing DOE and contractor procedures (BHI-EE-02, Environmental Requirements, Section 13) require deed restrictions to be registered with the county only if there is a land or property transfer.	
Until final remedy selection, DOE shall not delete or terminate any institutional control requirement established in this Interim Action ROD unless Ecology have provided written concurrence on the deletion or termination and appropriate documentation has been placed in the Administrative Record.		
1. Did DOE delete or terminate any institutional control requirement established in this Interim Action ROD?		
2. If so, did Ecology provide written concurrence on the deletion or termination and has appropriate documentation been placed in the Administrative Record?		
DOE will evaluate the implementation and effectiveness of institutional controls for the 100-NR-1 and 100-NR-2 operable units on an annual basis. DOE shall submit a report to Ecology by July 31 of each year summarizing the results of the evaluation for the preceding calendar year. At a minimum, the report shall contain an evaluation of whether or not the institutional control requirements continue to be met and a description of any deficiencies discovered and measures taken to correct problems.		
1. Has DOE assessed the implementation and effectiveness of the ICs on an annual basis? 2. Has DOE met the intent of Section 4.2 of the IC Plan? 3. Are the IC monitoring report submittal dates consistent? 4. How often should future IC monitoring reports be prepared?	All ICs were followed as required under the respective interim action RODs. Established ICs provided adequate safeguards for remediation actions. ICs and long-term monitoring will continue to be required for sites where wastes are left in place and preclude an unrestricted land use.	Additional measures may be necessary in the future to ensure long-term viability of ICs if the final remedial actions selected for the 100 Areas do not allow for unrestricted land use. Any additional controls may need to be specified as part of the final remedy.
100-KR-2 ROD Requirements.		
The DOE will maintain or implement access restrictions to prevent public access until final remedial action is completed.		

Evaluation Criteria	Assessment	Possible Repairs and Improvements
1. What methods are used to prevent access to the site?	The access control is accomplished by three barricades, which restrict entry to the Hanford Site. All personnel entering these barricades must be wearing a current badge. Other means of access control are badging, fences, and signs.	
Current access controls include signs along the river, and 8-foot fence, locked access to buildings containing the primary hazards, and routine patrols. Institutional controls will be included in the RDR/RAWP subject to EPA approval.		
1. What access controls are currently in use?	There are signs along the river, 8-foot fence, locked access to the building, and routine patrols. The ICs are included in DOE/RL-99-89, Rev. 1, "Remedial Design Report/Remedial Action Work Plan."	
100 Area Remaining Sites and Portions of 200 Area Interim Remedial Action ROD Requirements.		
Operable-Unit Specific ROD Requirements		
The DOE will continue to use a badging program to control access to the associated sites for the duration of the interim action. Visitors entering the sites associated with the Interim Action ROD are required to be escorted at all times.		
1. Is a badging program in use?	Yes, the badging program is utilized by BHI and its subcontractors. 100 Area sites are located within the Hanford boundary, badging is required for entry, and is verified by Hanford Patrol.	
2. Is a badging program in use?	FH manages the sitewide badging program through an implementing procedure. There are strict requirements for the visitors entering the Hanford Site. Visitors are required to be escorted at all times.	
DOE will utilize the onsite excavation permit process to control land use (e.g. well drilling or excavation of soil) within the 100 Area operable units.		
1. Is the excavation permit process implemented?	The excavation permitting process controls all excavation or drilling activities on the Hanford Site. The permitting process includes evaluation of proximity of the waste sites on the construction sites	
DOE will maintain existing signs prohibiting public access.		
1. Are there warning signs posted along the shoreline?	Yes, warning signs are posted along the shoreline.	
2. Do the signs identify a contact? If yes, identify:	Yes, the contact number listed is 509-376-7501.	
3. Are there "No Trespassing" signs posted along the shoreline?	Yes, "No Trespassing" signs are posted along the shoreline.	
4. Are the signs in good condition?	Yes, the signs are generally in good condition some are faded, but legible.	Periodically review and replace faded signs.
5. Do the signs identify a contact? If yes, identify:	No	
6. What is the location of the sign?	The signs are posted in various locations. The "No Trespassing" signs are posted above the river shoreline, along the shoreline in places, on access roads, and next to various waste sites.	

Evaluation Criteria	Assessment	Possible Repairs and Improvements
7. Are there warning signs along the access roads?	Yes, there are warning signs along the access roads. There was only one incident where no warning signs were present on an access to a waste site (128-C-1). The institutional controls in the 100 Area Remaining Sites ROD for this waste site include a requirement to have warning signs along the access road to this site. There are no signs on the access roads to this site from any direction.	Periodically review waste sites and access roads for adequate signage. ERC installed a warning sign along the access road. Issue considered corrected, and closed.
8. Do the signs identify a contact? If yes, identify:	Yes, the signs at the entrance into each reactor area identify a contact phone number (376-7501). There are also additional warning signs at various locations around the waste sites and within the operable units that do not have contact numbers, but do warn of construction dangers or radiation entry requirements.	
9. What is the location of the sign?	There are general warning signs posted at the entrance to each reactor area. There are also additional warning signs posted at various access roads.	
10. Are there warning signs posted?	There are "No Trespassing" signs every 500 feet along the perimeter of the Hanford Site. This requirement is specified in a contractor requirements document. The individual waste sites are posted.	
DOE will provide notification to EPA and Ecology upon discovery of any trespass incidents.		
1. Were there any trespass incidents?	Contacted BHI Project Managers verified there were no trespassing incidents onto any of the waste sites in Calendar Year 2002 or 2003 (to date). While there were incidents of potential trespass on the Hanford Site, none involved trespass of an IC (active or remediated) site. Trespass incidents were reported to the Benton County Sheriff's Office. Unauthorized personnel and members of the public, when encountered, were redirected to public access areas, no incidents of trespass resulted from these attempted accesses.	
2. If yes, how many occurred?	N/A	
3. Were the trespassing events reported?	While there were incidents of potential trespass on the Hanford Site, none involved trespass of an IC (active or remediated) site. Trespass incidents were reported to the Benton County Sheriff's Office. Unauthorized personnel and members of the public, when encountered, were redirected to public access areas, no incidents of trespass resulted from these attempted accesses.	
Trespass incident will be reported to Benton County Sheriff's Office for investigation and evaluation for possible prosecution.		

Evaluation Criteria	Assessment	Possible Repairs and Improvements
1. Were any trespassing incidents reported to the Benton County Sheriff?	While there were incidents of potential trespass on the Hanford Site, none involved trespass of an IC (active or remediated) site. Trespass incidents were reported to the Benton County Sheriff's Office. When unauthorized personnel and members of the public were encountered, they were redirected to public access areas, and no incidents of trespass resulted from these attempted accesses.	
DOE will take the necessary precautions to add access restriction language to any land transfer, sale, or lease of property that the U.S. Government considers appropriate while institutional controls are compulsory.		
1. Has there been a land transfer that requires EPA and Ecology approval? 2. Is there an internal RL procedure in place to ensure appropriate notification? 3. Is there a system in place that the Realty Officer can use to verify deed restrictions?	RL Realty Officer has the responsibility for land transfer, sale, or lease of property. During the Calendar Year 2002-2003, no such transactions took place. [On January 23, 2002, RL, by mutual agreement, entered into a lease with the Composite Power Corporation (CPC). The lease amendment contained a contingency providing a 60-day notice and opportunity to EPA and Ecology to review the subject lease.] As a matter of internal procedure, the Realty Officer would incorporate such restrictions in any real estate transactions. A process to identify IC restrictions placed on a site during the property transfer exists. The WIDS currently has a data field for institutional controls, e.g., deed restrictions. GSA Form SF-118 is used to document the IC restrictions. The existing DOE and contractor procedures (BHI-EE-02, Environmental Requirements, Section 13) require deed restrictions to be registered with the county only if there is a land or property transfer.	
Until final remedy selection, DOE shall not delete or terminate any institutional control requirement established in this Interim Action ROD unless EPA and Ecology have provided written concurrent on the deletion or termination and appropriate documentation has been placed in the Administrative Record.		
1. Did DOE delete or terminate any institutional control requirement established in this Interim Action ROD?	No	
2. If so, did Ecology provide written concurrence on the deletion or termination and has appropriate documentation been placed in the Administrative Record?	N/A	
DOE will evaluate the implementation and effectiveness of institutional controls for the 100 Area operable units on an annual basis. The DOE shall submit a report to EPA and Ecology by March 30 of each year summarizing the results of the evaluation for the preceding calendar year. At a minimum, the report shall contain an evaluation of whether or not the institutional control requirements continue to be met and a description of any deficiencies discovered and measures taken to correct problems.		

Evaluation Criteria	Assessment	Possible Repairs and Improvements
1. Do the existing institutional controls, evaluated in preceding year, continue to be effective?	<p>Prior to July 31, 2002, DOE submitted an institutional controls summary report for the 100-NR-1 and 100-NR-2 operable units, and the 100 Area remaining sites, which evaluated the implementation and effectiveness of the ICs established in the RODs. Subsequently, this annual report is incorporating an assessment of the aforementioned OUs and the remaining sites.</p> <p>All ICs were followed as required under the respective interim action RODs. Established ICs provided adequate safeguards for remediation actions. ICs and long-term monitoring will continue to be required for sites where wastes are left in place and preclude an unrestricted land use.</p>	Additional measures may be necessary in the future to ensure long-term viability of ICs if the final remedial actions selected for the 100 Areas do not allow for unrestricted land use. Any additional controls may need to be specified as part of the final remedy.
100-BC-1, 100-DR-1 and 100-HR-1 Operable Unit Amendment ROD Requirements.		
Use of institutional controls is mentioned, but no new requirements are given.		
	Not applicable	
100-HR-3 and 100-KR-4 Operable Units ROD Requirements.		
<p>Institutional controls are required to prevent human exposure to groundwater. The DOE is responsible for establishing and maintaining land-use and access restrictions until MCLs and risk-based criteria are met or the final remedy is selected. Institutional controls include placing written notification of the remedial action in the facility land-use master plan. The DOE will prohibit any activities that would interfere with the remedial activity without EPA and Ecology concurrence. In addition, measures necessary to ensure the continuation of these restrictions will be taken in the event of any transfer or lease of the property before a final remedy is selected. A copy of the notification will be given to any prospective purchaser/transferee before any transfer or lease. The DOE will provide EPA and Ecology with written verification that these restrictions have been put in place.</p>		
1. What methods are used to prevent/control land use?	<p>The implemented institutional controls include excavation permitting process, signs, capping and locking of the wellheads, barriers, and signs. The institutional controls are effective. A process to identify IC restrictions placed on a site during the property transfer exists. GSA Form SF-118 is used to document the IC restrictions. DOE Realty Officer, as a matter of internal procedures, will incorporate restrictions in any real estate transaction, and provide verification of restrictions imposed to EPA and Ecology.</p> <p>The composite of the CLUP, IC Plan, recording of deeds, and WIDS provide the equivalency to a land-use master plan that was previously used.</p>	
100-IU-1, 100-IU-3, 100-IU-4, and 100-IU-5 Operable Units ROD Requirements.		

Evaluation Criteria	Assessment	Possible Repairs and Improvements
There are no institutional controls mentioned in this ROD.	Not applicable	
100-BC-1, 100-DR-1 and 100-HR-1 Interim Remedial Action ROD Requirements.		
Operable -Unit Specific ROD Requirements		
DOE will control access and use of the Site for the duration of the cleanup, including restrictions on the drilling of new groundwater wells in the existing plumes or their paths. It is expected that institutional controls will be enforced until the remedial action objectives have been attained.		
1. What methods are used to control site access?	Access to the Hanford Site is restricted to those who are badged in accordance with DOE badging procedures. Access to the waste sites in the 100 Areas is restricted to those individuals with valid badges. For access to the Hanford Site, the badges are checked at the Hanford Barricades (Wye, Rattlesnake, and Yakima Barricades). The barricades are posted with access restriction warning signs. There are warning signs and "no trespassing" signs posted along the Columbia River Shoreline. These signs identify a contact number (509-376-7501). There are also additional signs posted at access roads to selected waste sites.	
Amended ROD Environmental Restoration Disposal Facility (ERDF) Requirements (March 25, 1999).		
No institutional control requirements were added, modified, or deleted.		
	Not applicable	
Amended ROD ERDF Requirements (September 30, 1997)		
No institutional control requirements were added, modified, or deleted.		
	Not applicable	
200-UP-1 Operable Unit ROD Requirements.		
Institutional controls are required to prevent human exposure to groundwater. The U.S. DOE is responsible for establishing and maintaining land-use and access restrictions until the final remedy is selected and implemented.		
1. What methods are used to prevent/control land use?	The composite of the CLUP, IC Plan, recording of deeds, and WIDS provide for land-use and access restrictions.	
Institutional controls include placing written notification of the remedial action in the facility land-use master plan.		

Evaluation Criteria	Assessment	Possible Repairs and Improvements
1. Is there a current facility land-use master plan?	<p>DOE completed a Hanford Comprehensive Land-Use Plan EIS (CLUP-EIS) in September 1999 (DOE 1999a), and a ROD was issued on November 2, 1999 (64 FR 61615). The purpose of the land-use plan is to facilitate decision-making about the Hanford Site's uses and facilities over at least the next 50 years. The land-use plan consists of several key elements; they include a land-use map that addresses the Hanford Site as five geographic areas.</p> <p>The composite of the CLUP, IC Plan, recording of deeds, and WIDs provide the equivalency to a land-use master plan that had been previously used.</p>	The IC Plan and the corresponding ROD would need to be revised to reflect this change.
The U.S. DOE will prohibit any activities that would interfere with the remedial activity without the lead agency's concurrence.		
1. Are there adequate procedures in place to implement this requirement?	During the past calendar year, there have been no events that would interfere with the on-going remedial activities at the Hanford Site. Thus, DOE recognizes that such events would require coordination and prior approval from the lead regulatory agencies. DOE, through the Real Property Officer, would fully coordinate any land-use issues or transactions internally and externally, as required by DOE's procedures. All of the remedial activities at the Hanford Site are driven by specific TPA milestones for which there are specific milestones.	
In addition, measures necessary to ensure the continuation of this restriction will be taken in the event of any transfer or lease of the property before the final remedy is selected. A copy of the notification in a land-use plan will be given to any prospective purchaser/transfer before any transfer or lease. U.S. DOE will provide Ecology and EPA within written verification that these restrictions have been put in place.		
1. Are there adequate procedures in place to implement this requirement?	RL Realty Officer has the responsibility for land transfer, sale, or lease of property and required notifications. During the Calendar Year 2002-2003, no such transactions took place. [On January 23, 2002, RL, by mutual agreement, entered into a lease with the Composite Power Corporation (CPC). The lease amendment contained a contingency providing a 60-day notice and opportunity to EPA and Ecology to review the subject lease.] As a matter of internal procedure, the Realty Officer would make necessary notifications in any real estate transactions. A process to identify IC restrictions placed on a site during the property transfer exists. The WIDS currently has a data field for institutional controls, e.g., deed restrictions. GSA Form SF-118 is used to document the IC restrictions. The existing DOE and contractor procedures (BHI-EE-02, Environmental Requirements, Section 13) require deed restrictions to be registered with the county only if there is a land or property transfer.	

Evaluation Criteria	Assessment	Possible Repairs and Improvements
ERDF ROD ESD Requirements.		
No institutional control requirements were added, modified, or deleted.		
	Not applicable	
200-ZP-1 Operable Unit Interim Remedial Measures ROD Requirements.		
No specific institutional control requirements were given.		
	Not applicable	
ERDF ROD Requirements.		
Operable -Unit Specific ROD Requirements		
Institutional controls shall be imposed to restrict public access to the landfill.		
1. What methods are used to restrict public access?	Perimeter of ERDF is surrounded by a fence. The fence has numerous warning signs. The main entrance has a gate that prevents people from entering the site during non-work hours.	
300-FF-2 ROD Requirements (Required at Current Time and During Cleanup Activity)		
Operable -Unit Specific ROD Requirements		
DOE shall control access to the waste sites addressed in the scope of this ROD until cleanup is complete. Visitors entering any uncovered waste site area are required to be escorted at all times.		
1. What methods are used to prevent access to the site?	BHI utilizes the Hanford Site badging process. There are fences restricting access into the 300 Area.	
2. Is there a process in place of escorting visitors?	Contacted the Subcontractor Technical Representative who identified the process for obtaining badges for unbadged visitors to the 300 Area remediation sites. A visitor badge request form is sent to Human Resources at Bechtel. A temporary badge is processed for the visitor. The visitor is also required to view a short video identifying the emergency signals and signs used at the Hanford Site. The project point of contact meets the visitor at the Bechtel building and escorts them to the 300 Area. The visitor is escorted through the remainder of the visit.	
3. What methods are used to prevent access to the site?	Access to the Hanford Site is controlled through three guarded barricades. Authorized personnel entering the Hanford Site are required to wear a badge. FH manages the sitewide badging program. There are strict requirements for the visitors entering the Hanford Site. Visitors are required to be escorted at all times.	
DOE will maintain exiting signs prohibiting public access.		

Evaluation Criteria	Assessment	Possible Repairs and Improvements
1. Are there warning signs posted along the shoreline?	Yes, warning signs are posted along the shoreline.	
2. Do the signs identify a contact? If yes, identify:	Yes, the contact number listed is 509-376-7501.	
3. Are there "No Trespassing" signs posted along the shoreline?	Yes, "No Trespassing" signs are posted along the shoreline.	
4. Are the signs in good condition?	Yes, the signs are generally in good condition; some are faded, but legible.	
5. Do the signs identify a contact? If yes, identify:	No	
6. What is the location of the sign?	The signs are posted in various locations. The "No Trespassing" signs are posted above the river shoreline, along the shoreline in places, on access roads, and next to various waste sites.	
7. Are there warning signs along the access roads?	Yes, there are warning signs along the access roads. However, no warning signs were present on the access road to two waste sites (300-VTS and 618-7). These waste sites are across the street from the 300 Area. These sites are fenced and have warning signs along the fence.	Periodically review 300 Area to ensure adequate signage.
8. Do the signs identify a contact? If yes, identify:	Yes, the signs at the entrance into the 300 Area identify the contact phone number (376-7501). There are also additional warning signs at various locations around the waste sites and within the operable units that do not have contact numbers, but warn of construction dangers or radiation entry requirements. There were two incidents where the contact phone number was incorrect.	Periodically review signs for correct information, such as contact numbers.
9. What is the location of the sign?	There are general warning signs posted at the entrance to the 300 Area. There are also additional warning signs posted at various access roads. There are additional warning signs posted on perimeter fencing.	
DOE shall prohibit well drilling in any waste site areas, except for monitoring or remediation wells authorized in EPA approved documents. Groundwater use is prohibited, except for limited research purposes and monitoring and treatment authorized in EPA approved documents. These restrictions apply until groundwater cleanup objectives (as established in the 300 FF 5 ROD) have been achieved.		
1. Has there been any well drilling?	The excavation permitting process controls all excavation or drilling activities on the Hanford Site. The excavation permitting process includes evaluation of proximity of the waste site on the construction sites.	
DOE shall control all intrusive work in any waste site areas addressed by this ROD.		
	The excavation permitting process controls all excavation or drilling activities on the Hanford Site. The excavation permitting process includes evaluation of proximity of the waste site on the construction sites.	

Evaluation Criteria	Assessment	Possible Repairs and Improvements
DOE shall post and maintain warning signs along the Columbia River shoreline that caution river users of potential hazards from 300 Area waste sites and spring discharges.		
1. Are there warning signs posted along the shoreline?	There are warning signs along the high water mark along the shoreline. The signs were observed from a distance. A boat trip is necessary to observe the signs correctly.	
DOE shall post and maintain warning signs along access roads that caution Site visitors and workers of potential hazards from 300 Area waste sites.		
1. Are there warning signs along the access roads?	<p>There are warning signs every 500 feet along the road and at the entrances to the 300 Area. The institutional controls in the Interim ROD for the 300-FF-2 OU for this waste site include a requirement to "post and maintain warning signs along the access roads that caution Site visitors and workers of potential hazards from the 300 Area waste sites." The access road to the 300 -VTS waste site did not have any warning signs posted. However, there were warning signs posted at the gate to the 300-VTS.</p> <p>Also, access road to the 618-7 waste site did not have a warning sign posted. However, there were warning signs posted at the gate to 618-7.</p>	<p>ERC installed a warning sign along the main access road to the 300-VTS waste site. Issue considered corrected and closed.</p> <p>ERC installed a warning sign along the main access road to the 618-7 waste site. Issue considered corrected and closed.</p>
DOE will provide notification to EPA and Ecology upon discovery of any trespass incidents.		
1. Were there any trespass incidents?	There were no known trespass incidents into the 300 Area, as verified by the BHI Project Managers. While there were incidents of potential trespass on the Hanford Site, none involved trespass of an IC (active or remediated) site. Trespass incidents were reported to the Benton County Sheriff's Office. When unauthorized personnel and members of the public were encountered, they were redirected to public access areas, and no incidents of trespass resulted from these attempted accesses.	
2. If yes, how many occurred?	N/A	
3. Were the trespassing events reported?	While there were incidents of potential trespass on the Hanford Site, none involved trespass of an IC (active or remediated) site. Trespass incidents were reported to the Benton County Sheriff's Office. Unauthorized personnel and members of the public when encountered were redirected to public access areas, no incidents of trespass resulted from these attempted accesses.	
Trespass incident will be reported to Benton County Sheriff's Office for investigation and evaluation for possible prosecution.		

Evaluation Criteria	Assessment	Possible Repairs and Improvements
1. Were any trespassing incidents reported to the Benton County Sheriff?	While there were incidents of potential trespass on the Hanford Site, none involved trespass of an IC (active or remediated) site. Trespass incidents were reported to the Benton County Sheriff's Office. When unauthorized personnel and members of the public were encountered, they were redirected to public access areas, and no incidents of trespass resulted from these attempted accesses.	
Sitewide Institutional Control Requirements		
A plan for implementing these requirements shall be submitted by DOE in a sitewide institutional controls plan (as required by the "100 Area Burial Ground ROD," September 2000). Pursuant to the 100 Area Burial Ground ROD, the sitewide implementation plan must be submitted to EPA and Ecology as a primary document under the Tri-Party Agreement by July 2001.		
1. Has an IC Plan been submitted to the regulators for approval?	In July of 2002, the Tri-Party agencies approved a plan titled "Sitewide Institutional Controls Plan for Hanford CERCLA Response Actions," DOE/RL-2001-41 Rev. 0. Subsequent to this annual assessment, the Tri-Party Agreement agencies may decide to update the plan consistent with any existing or new CERCLA decision documents.	
300 FF-2 ROD Requirements (Required After Cleanup is Complete)		
DOE shall ensure that former waste site locations are restricted to industrial use only, consistent with the exposure assumptions used in establishing risk-based cleanup levels for radionuclides and the use of MTCA Method C industrial cleanup levels for chemicals.		
DOE will maintain a surveillance program to document that risk or ARAR-based cleanup levels (and the exposure durations upon which they are based) are not exceeded. This will not be required if remediation work results in soil concentrations that would permit unrestricted use and unlimited exposure.		
1. Does DOE have a system in place to ensure that former waste site locations are restricted to industrial use only, consistent with the appropriate exposure assumptions?	Use of the 300 Area is restricted to industrial activities consistent with the industrial use exposure assumptions. Deed restrictions, land-use plan, and other IC tools for 300 Area waste sites are expected to prevent any unauthorized land-uses.	
2. Does DOE have a surveillance program in place to document that risk or ARAR based cleanup levels (and the exposure durations upon which they are based) are not exceeded?	DOE has a surveillance and maintenance program in place that restricts access to these sites based on visual surveillance by project managers. DOE Real Estate Officer assures that deed restrictions are enforced.	
DOE shall maintain groundwater and Columbia River protection standards including:		
a) Infiltration controls (e.g., revegetation, asphalt, concrete) must be maintained as part of this remedy or remedial action goals/soil cleanup levels must be reevaluated and modified using different evapotranspiration coefficients (i.e., gravel does not prevent infiltration through residual contamination) pursuant to procedures established in the EPA approved remedial design/remedial action workplan.		
1. Are infiltration controls (e.g., revegetation, asphalt, concrete) adequately maintained as part of this remedy?	As the sites remediate, DOE consistent with the mitigation action plan, the sites are revegetated and monitored.	

Evaluation Criteria	Assessment	Possible Repairs and Improvements
b) No irrigation will be permitted for agriculture or landscaping on former waste site locations.		
1. Is irrigation permitted for agriculture or landscaping on any former waste site locations?	No, there is no agricultural use for land in the 300 Area, and there is no irrigation of landscaping on any former waste site locations.	
c) These infiltration control measures and irrigation restrictions shall be maintained unless (or until) it can be demonstrated that there will be no negative impact on groundwater or river water quality from residual contamination at former waste site locations.		
1. Has DOE taken any action to demonstrate that there will be no negative impact on groundwater or river water quality from residual contamination at former waste site locations if infiltration controls are removed or the site is irrigated?	Infiltration control measures and irrigation restrictions have been maintained.	
DOE shall control the removal of soil or debris from former waste site locations in the 300 Area NPL site. Soil or debris from former waste site locations can only be removed for other uses if concentrations meet cleanup levels that are based on an unrestricted use exposure scenario. Additional soil or debris can be removed from former waste site locations if they are being sent to a disposal facility approved in advance by EPA.		
1. Has any soil or debris been removed from former waste site locations in the 300 Area NPL site for uses other than disposal?	No	
2. If soil or debris from former waste site locations was removed for other uses, did the concentrations meet cleanup levels that are based on an unrestricted use exposure scenario?	N/A	
3. If soil or debris from former waste site locations was removed, were they being sent to a disposal facility approved in advance by EPA?	Yes, the soil and debris is sent to ERDF.	
DOE shall limit the removal of soil or debris from former waste site locations where contaminated soils and/or debris remain at depth (i.e., below 15 feet) above direct contact/direct exposure cleanup levels. Any material left at depth above these standards can only be removed from the former waste site location if it is being sent to a disposal facility approved in advance by EPA.		
1. Has any soil or debris been removed from former waste site locations where contaminated soils and/or debris remain at depth (i.e., below 15 feet) above direct contact/direct exposure cleanup levels?	No	
2. If so, were they sent to a disposal facility approved in advance by EPA?	N/A	
DOE shall establish and maintain a records system or database that tracks locations and estimated quantities of residual contamination left in place at waste sites that would preclude unlimited use or unrestricted exposure.		

Evaluation Criteria	Assessment	Possible Repairs and Improvements
1. Has DOE established a records system or database that tracks locations and estimated quantities of residual contamination left in place at waste sites that would preclude unlimited use or unrestricted exposure?	Yes, WIDS. WIDS tracks locations and estimated quantities of residual contamination.	For remediated 300 Area sites, expand the "Post-Closure Requirements" section of WIDS to state "industrial land use only," where applicable, because the Tri Party Agencies have already signed WIDS reclassification forms for the sites subject to the recommendations, a regulatory concurrence will be necessary before making changes to the WIDS entries. A list of these waste sites will be provided.
2. Is that system/database maintained in an accurate, up-to-date status?	Yes, the database is updated through approved CVP documentation.	
Sitewide Institutional Control Requirements		
A plan for implementing these requirements shall be submitted by DOE in a sitewide institutional controls plan (as required by the "100 Area Burial Ground ROD," September 2000). Pursuant to the 100 Area Burial Ground ROD, the sitewide implementation plan must be submitted to EPA and Ecology as a primary document under the Tri-Party Agreement by July 2001.		
1. Has an IC Plan been submitted to the regulators for approval?	In July of 2002, the Tri-Party agencies approved a plan titled "Sitewide Institutional Controls Plan for Hanford CERCLA Response Actions," DOE/RL-2001-41 Rev. 0. Subsequent to this annual assessment, the Tri-Party Agreement agencies may decide to update the plan consistent with any existing or new CERCLA decision documents.	
300 Area Explanation of Significant Difference for the 300-FF-5 ROD Requirements.		
Institutional controls preventing use of the 300 Area groundwater will remain in place.		

Evaluation Criteria	Assessment	Possible Repairs and Improvements
1. Are there specific restrictions and criteria in place to limit the use of groundwater in the 300 Area?	The implemented institutional controls include excavation permitting process, signs, capping and locking of the wellheads, barriers, and signs. The institutional controls are effective. With the exception of 331 Facility in the 300 Area, there is no use of the groundwater. As recognized by the 300-FF-2 ROD, the 331 Aquatic Laboratory is used for conducting aquatic research for a wide variety of clients, including DOE, BPA, and the US Army Corps of Engineers. Water supply sources for 331 Aquatic Laboratory include both Columbia River and well water. The well water is mixed with river water to provide a reliable source of pathogen-free, temperature controlled, reduced-solids water. Water production from the well is limited to 600 gpm. Prior to May 5, 1999, the discharge point from the 331 aquaculture system to the Columbia River was permitted under the Hanford Site sitewide NPDES Permit-WA-000374-3. This permit is no longer necessary.	
300 Area Explanation of Significant Difference (ESD) for the 300-FF-1 ROD Requirements.		
No institutional control requirements were added, modified, or deleted.		
	Not applicable	
300-FF-1 and 300-FF-5 ROD Requirements.		
Operable -Unit Specific ROD Requirements		
Institutional controls are required to prevent human exposure to groundwater and to ensure that unanticipated changes in land use do not occur that could result in unacceptable exposure to residual contamination. The DOE is responsible for establishing and maintaining land-use and access restrictions until clean up criteria are met.		
1. What methods are used to prevent/control land use?	BHI utilizes the Hanford Site badging process. There are fences restricting access into the 300 Area. Contacted the Subcontractor Technical Representative, who identified the process for obtaining badges for unbadged visitors to the 300 Area remediation sites. A visitor badge request form is sent to Human Resources at Bechtel. A temporary badge is processed for the visitor. The visitor is also required to view a short video identifying the emergency signals and signs used at the Hanford Site. The project point of contact meets the visitor at the Bechtel building and escorts them to the 300 Area. The visitor is escorted through the remainder of the visit.	

Evaluation Criteria	Assessment	Possible Repairs and Improvements
2. What methods are used to prevent/control land use?	The implemented institutional controls include excavation permitting process, signs, capping and locking of the wellheads, barriers, and signs. The institutional controls are effective.	
Institutional controls include placing written notification of the remedial action in the facility land-use master plan.		
1. Is there a current facility land-use master plan?	DOE completed a Hanford Comprehensive Land-Use Plan EIS (CLUP-EIS) in September 1999 (DOE 1999a), and a ROD was issued on November 2, 1999 (64 FR 61615). The purpose of the land-use plan was to facilitate decision-making about the Hanford Site's uses and facilities over at least the next 50 years. The land-use plan consists of several key elements; they include a land-use map that addresses the Hanford Site as five geographic areas. The composite of the CLUP, IC Plan, recording of deeds, and WIDS provide the equivalency to a land-use master plan that had been previously used.	The IC Plan and the corresponding ROD would need to be revised to reflect this change.
The DOE will prohibit any activities that would interfere with the remedial activity without EPA concurrence.		
1. Are there adequate procedures in place to implement this requirement?	During the past calendar year, there have been no events that would interfere with the on-going remedial activities at the Hanford Site. Thus, DOE recognizes that such events would require coordination and prior approval from the lead regulatory agencies. DOE, through the Real Property Officer would fully coordinate any land-use issues or transactions internally and externally, as required by DOE's procedures. All of the remedial activities at the Hanford Site are driven by specific TPA milestones for which there are specific milestones.	
In addition, measures acceptable to EPA that are necessary to ensure the continuation of these restrictions will be taken before any transfer or lease of the property. A copy of the notification will be given to any prospective purchaser/transferee before any transfer or lease. The DOE will provide EPA with written verification that these restrictions have been put in place.		

Evaluation Criteria	Assessment	Possible Repairs and Improvements
<p>1. Has there been a land transfer that requires EPA and Ecology approval?</p> <p>2. Is there an internal RL procedure in place to ensure appropriate notification?</p> <p>3. Is there a system in place that the Realty Officer can use to verify deed restrictions?</p>	<p>RL Realty Officer has the responsibility for land transfer, sale, or lease of property and required notifications. During the Calendar Year 2002-2003, no such transactions took place. [On January 23, 2002, RL, by mutual agreement, entered into a lease with the Composite Power Corporation (CPC). The lease amendment contained a contingency providing a 60-day notice and opportunity to EPA and Ecology to review the subject lease.] As a matter of internal procedure, the Realty Officer would make necessary notifications in any real estate transactions. A process to identify IC restrictions placed on a site during the property transfer exists. The WIDS currently has a data field for institutional controls, e.g., deed restrictions. GSA Form SF-118 is used to document the IC restrictions. The existing DOE and contractor procedures (BHI-EE-02, Environmental Requirements, Section 13) require deed restrictions to be registered with the county only if there is a land or property transfer. As outlined in the ESD for "100-NR-1 operable unit treatment, storage, and disposal interim action ROD" that was signed May 27, 2003, for example, the ESD states no additional excavation is necessary below 15 feet if irrigation is prohibited. The ESD action is consistent with DOE's CLUP ROD. The existing DOE and contractor procedures (BHI-EE-02, Environmental Requirements, Section 13) require deed restrictions to be registered with the county only if there is a land or property transfer.</p>	
1100 Area Superfund Site Closeout Report Requirements.		
Plans are in place for DOE to inspect and maintain the integrity of the cap and fencing at the Horn Rapids Landfill.		
<p>1. Was there a RL program responsible for inspecting and maintaining the integrity of the cap and fencing at the landfill?</p> <p>2. Is the fence surrounding the landfill in a good condition?</p>	<p>Yes, BHI's Surveillance and Maintenance Project. As per the surveillance sheets completed by BHI, there were no cave-ins, depressions, or no animal intrusion.</p> <p>The wire fencing around the landfill is in a good condition. However, one wire strand between two metal posts needs to be repaired.</p>	
3. Did RL program have a plan in place to inspect and maintain the landfill cap and fencing?	Yes, BHI's Field Support Task Instruction, Surveillance of the 200-E and 600 Area.	
4. Was the plan successfully implemented?	Yes, per Horn Rapids Landfill Surveillance Data Sheets for Calendar Year 2002.	
Continued groundwater monitoring around the Horn Rapids Landfill is necessary to verify the modeled contaminant attenuation predictions and to evaluate		

Evaluation Criteria	Assessment	Possible Repairs and Improvements
the need for active remedial measures.		
1. Is the groundwater monitoring necessary to verify modeled contaminant attenuation predictions?	Yes. There is an on-going groundwater monitoring at the Landfill. The models study state simulation of TCE concentrations in the unconfined aquifer for a 10-year half-life shows 5×10^{-3} mg/L at Stevens Drive northeast of the Horn Rapids Landfill. (See DOE/RL 90-18 Figure 5-8.)	
3. Do the remedial measures need to be reevaluated?	No, according to the Hanford Site Groundwater Monitoring report for FY 2002, March 2003, PNNL, the remedial objectives as specified in the ROD are being met. TCE concentrations have decreased in essentially all the plume areas near DOE's inactive Horn Rapids Landfill. The maximum average TCE concentration was .0041 µg/L. (See "Hanford Site Groundwater Monitoring for FY 2002," March 2003, PNNL)	
1100 Area ROD Requirements.		
DOE will control access and use of the Site for the duration of the cleanup, including restrictions on the drilling of new groundwater wells in the plume or its path will be enforced until the Remedial Action Objectives have been attained.		
1. Is RL controlling access and use of the site until the Remedial Action Objectives are attained?	Yes	
2. If so, how? Are the controls adequate?	The site is fenced with locked gates. Access restriction signs are posted on the fence. The controls adequately restrict access.	One portion of the fence requires repair.
3. Does the land-use plan provide for restrictions on installation of new water wells and utilization of groundwater resources?	The existing deed restrictions provide for restrictions on installation of well water and its use.	
DOE will record a notation on the deed to the Horn Rapids Landfill property as specified in the asbestos NESHAP (40 CFR 61).		
1. Has DOE met this requirement?	June 12, 1997, EPA was notified by DOE regarding Recorded Notice in Deed for Horn Rapids Landfill. The Benton County Auditor's file number is 97-8784. A copy of the notice in deed was provided to the US EPA.	